



## CODE OF ETHICS

### 1. INTRODUCTION, OBJECTIVE, SCOPE AND APPLICATION AREA

Opdenenergy is an organization with global presence, constantly expanding and focusing its activity on the production of energy assets and the management of all its phases: development, financing, construction, operation and maintenance.

Within the framework of this activity, the Organization wants to commit to:

- Carry out its operations in an ethical, trustworthy and honest way.
- Ensure compliance with the applicable requirements.
- Treat all its stakeholders with respect and dignity.
- Create fair and safe working areas, with the necessary resources and environment.
- Protect its reputation as an organization to work for and with whom to partner up for business.
- Grow and develop in a sustainable way.

For this reason, the Board of Directors of Opdenenergy has decided to approve and implement this Code of Ethics, which aims to establish the basic principles that shall govern the Organization's behavior.

This Code of Ethics applies to any activity, area or subsidiary company of the OPDE Group, made up by the parent company (holding) OPDE Investment España S.L. and its subsidiary companies operating through the Opdenenergy brand.

The contents of the Code of Ethics must be respected by all the administrative bodies and Organization members (employees and other parties acting on their behalf), regardless of their organizational level, business area, geographical location or Group company where they belong.

This Code of Ethics is not intended to cover all possible situations that may arise in the development of the Organization's activity, but to establish a series of guidelines and minimum standards of conduct.

If there are other requirements which apply to individuals and legal entities subject to this Code of Ethics that are stricter than its provisions, including both legal and regulatory requirements and other requirements that the Organization subscribes, they shall also be obeyed.

### 2. ETHICAL PRINCIPLES AND RULES OF CONDUCT

#### **Compliance with applicable regulations:**

The Organization and its members commit to respect and comply with all applicable regulations, including both legal and regulatory requirements and other requirements that the Organization subscribes to.

The legal framework of the geographical area (international, national and local) has to be taken into consideration, as well as the applicable regulations and the baseline regulations.

Likewise, attention must be paid to the declarations, codes, policies and internal regulations of the Organization, as well as to the commitments and voluntary agreements signed by it.



**Conflicts of interests:**

The Organization and its members commit to proceed impartially in situations of conflict of interest in which they may be involved.

Especially, no personal or professional activities shall be carried out, nor direct or indirect interests pursued, that might interfere with the applicable responsibilities in the Organization.

Any query or doubt in the matter has to be communicated prior to any decision making to the body in charge of supervising the operation and observance of the model of compliance management and crime prevention.

**Illicit payments and anti-corruption principles:**

The Organization and its members are prohibited from offering or accepting illicit payments in any situation, such as (but not limited to), bribes, kickbacks and other similar compensations.

**Human rights and employee rights:**

The Organization and its members have to respect the principles embodied in the Universal Declaration of Human Rights of the United Nations (UN), as well as fundamental principles and rights included in the Declaration of the International Labor Organization (ILO).

Especially, they commit not to participate in the trafficking of human beings, not to employ child labor, or to use forced, involuntary or enslaved labor. These behaviors will not be tolerated either in the commercial relations of the Organization with other external stakeholders.

The Organization shall maintain strict and objective recruitment programs, focusing exclusively on the candidate's academic, personal and professional merits and their human resource needs.

Particularly, it refrains from tolerating any type of harassment (physical, mental, moral or by authority), to promote equal opportunities and to avoid any type of discrimination, to respect the right to freedom of association, trade-union freedom and collective bargaining, as well as to ensure decent work conditions, respecting the established minimum wages in the applicable legislation.

The Organization and its members shall promote labor relations based on respect and honesty among peers, as well as promoting a culture of integrity, respecting the diversity and intimacy of each individual.

**Quality:**

The Organization and its members have to ensure the compliance of the products and services with the applicable requirements, promote an approach to increase customer satisfaction and respond to the needs and expectations of stakeholders. Workers will receive the necessary means to do so and awareness will be promoted.

**Environment:**

The Organization and its members have to pursue the engagement to protect the environment, through the prevention of pollution, the sustainable use of natural resources and the promotion of energy efficiency and a low carbon economy. Workers will receive the necessary means to do so and awareness will be promoted.



The Organization and its members have to respect meticulously the applicable regulations regarding environmental matters in all locations where they develop their business activities, as well as safeguard their compliance by other internal or external workers.

**Health and Safety at work:**

The Organization and its members shall guarantee adequate conditions of safety, hygiene and well-being to address the engagement to prevent harm and deterioration of health. The workers will receive the relevant protective equipment and all the necessary training in the subject. Unsafe behaviors will not be tolerated.

The Organization and its members have to respect meticulously the applicable regulations regarding health and safety in all locations where they develop their business activities, as well as safeguard their compliance by other internal or external workers.

**Social commitment and support to the local community:**

The Organization and its members are committed to promoting the improvement of the quality of life and well-being of all people and communities that are related to their activities and, in particular, they have to respect scrupulously the legal framework, cultural diversity and customs and current principles in force in the geographical area.

**Confidentiality, information management and protection:**

The Organization and its members commit to respect confidentiality and the right to privacy in all its appearances and, in particular, with regard to the applicable provisions and requirements regarding the protection of personal data, as well as the information provided by third parties.

Generally, it is forbidden to disclose personal data or information provided by third parties (unless express consent of the interested parties, legal obligation or compliance with judicial or administrative resolutions), to reveal confidential information of the Organization, to provide incorrect or inaccurate information deliberately and to use the information for their own benefit or that of third parties in an unlawful manner.

Special attention will be paid to the signing of confidentiality agreements (NDA) in situations that require the sharing of sensitive information.

**Communication and transparency:**

The Organization and its members are committed to transmitting true and complete information about their business activities. The communication will always be made in accordance with the rules and in the terms established by the applicable legislation.

**3. SUPERVISION AND COMPLIANCE WITH THE CODE OF ETHICS**

The Organization, through a model of compliance management and crime prevention, will monitor and control that the principles established in this Code of Ethics are applied internally by all its stakeholders. Likewise, the Organization will promote the application of these same principles by other external stakeholders, such as its suppliers and collaborators.



**CODE OF ETHICS**  
**GENERAL POLICY**

The Top Management grants the availability of the necessary resources for its fulfillment and requests all the people working on behalf of the Organization, to actively participate and contribute to the effectiveness of the management model.

Equally, the Organization requests all its stakeholders (internal or external) to report possible risks or breaches when they consider that the principles of this Code of Ethics are being violated, through the complaints channel [compliance@opdeenergy.com](mailto:compliance@opdeenergy.com).

The Organization shall guarantee that access to the notified facts is completely restricted, secure and confidential, treating the received information anonymously and in accordance with the applicable regulations on privacy and data protection (except in those cases that have to be communicated to the authorities according to the current legislation).

The body in charge of supervising the operation and observance of the Crime Prevention and Compliance Management Model will be responsible for adopting the appropriate measures and applying the disciplinary system established by the model. Likewise, it will guarantee that the periodic verifications and necessary modifications of the model and its implementation are carried out.

**The Board of Directors of Opdeenergy.**

This document has been translated. For any doubt or misunderstanding  
please refer to the official version approved by the Organization.